

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:)	CASE NO. BK09-80404
)	
SANITARY AND IMPROVEMENT)	CHAPTER 9
DISTRICT #452 OF DOUGLAS)	
COUNTY, NEBRASKA,)	
)	
Debtor.)	

**JOINT MOTION TO EXTEND THE TIME TO FILE
THE DEBTOR'S PLAN OF ADJUSTMENT**

COMES NOW the Debtor, Sanitary and Improvement District #452 of Douglas County, Nebraska, (hereinafter "SID #452"), by and through its counsel of record, Mark J. LaPuzza of the firm of Pansing, Hogan Ernst & Bachman, LLP, and the Committee of Unsecured Creditors, by and through its counsel of record, William L. Biggs of the firm of Gross & Welch, P.C., L.L.O., and hereby request that the Court extend the time for Debtor to file its plan for the adjustment of Debtor's debts. In support thereof, Debtor and the Committee of Unsecured Creditors state as follows:

1. SID #452 is the Debtor in the above-captioned Chapter 9 proceeding which was filed on February 24, 2009.
2. The Committee of Unsecured Creditors was appointed in the above-captioned Chapter 9 proceeding on March 26, 2009, with the notice of appointment filed on that date. On April 8, 2009, counsel for the Committee of Unsecured Creditors was engaged.
3. Pursuant to Local Rule 2080-1(D)(1), "The court may extend such time for good cause shown."
4. The Debtor and the Committee of Unsecured Creditors requested by Joint Motion that the Court grant the Debtor until September 30, 2009, to file its plan, and the Court granted such motion.
5. The Debtor and the Committee of Unsecured Creditors have discussed the financial status of the Debtor including 2009 and projected 2010 revenue, unpaid special assessments owing to the Debtor, and current development plans. Such financial matters will provide the basis of the future Plan of Adjustment, based upon the Debtor's future ability to pay its creditors.

6. For these reasons, and for the opportunity to come to terms on a plan acceptable to both the Debtor and the Committee of Unsecured Creditors, the Debtor and the Committee of Unsecured Creditors seek more time in order to prepare a plan for filing and dissemination. The Debtor and the Committee of Unsecured Creditors believe that a reasonable time for the filing of such a plan would be September 30, 2009.

WHEREFORE the Debtor and Committee of Unsecured Creditors jointly pray that the Court extend the deadline to file a Plan until September 30, 2009, and that the Debtor have such other and further relief as is just and equitable.

DATED this 13th day of July, 2009.

SANITARY AND IMPROVEMENT
DISTRICT #452 OF DOUGLAS
COUNTY, NEBRASKA

By /s/ Mark J. LaPuzza

Mark J. La Puzza #22677
Pansing Hogan Ernst Bachman LLP
10250 RegencyCircle, Suite 300
Omaha, NE 68114
(402) 397-5500
Fax : (402) 397-4853
Email: mjlbr@pheblaw.com

ITS ATTORNEY

COMMITTEE OF UNSECURED CREDITORS,

By /s/ William L. Biggs

William L. Biggs, #10317
GROSS & WELCH, P.C., L.L.O.
2120 South 72nd Street, Suite 1500
Omaha, NE 68124
(402) 392-1500
(402) 392-1538 (fax)
Email – bbiggs@grosswelch.com

ITS ATTORNEY